

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Jane Doe,

Plaintiff,

No. 1:24-cv-07777

v.

SEAN COMBS, DADDY’S HOUSE RECORDINGS INC.,
CE OPCO, LLC d/b/a COMBS GLOBAL f/k/a
COMBS ENTERPRISES LLC, BAD BOY
ENTERTAINMENT HOLDINGS, INC.,
BAD BOY PRODUCTIONS HOLDINGS, INC.,
BAD BOY BOOKS HOLDINGS, INC., BAD BOY
RECORDS LLC, BAD BOY ENTERTAINMENT LLC,
BAD BOY PRODUCTIONS LLC,
and ORGANIZATIONAL DOES 1-10.

Defendants.

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**DECLARATION OF ANTHONY G. BUZBEE IN SUPPORT
OF PLAINTIFF’S MOTION TO PROCEED ANONYMOUSLY**

I, Anthony G. Buzbee, hereby declare as follows:

1. I am the owner of The Buzbee Law Firm and counsel for Jane Doe.
2. I make this Declaration in support of Plaintiff’s motion to proceed anonymously.
3. If required by this Court, I will disclose Plaintiff’s name to counsel for Defendants.

However, I would request a hearing prior to any such order.

4. Plaintiff is by no means the only victim of Mr. Combs to fear violence in retribution for coming forward. My firm currently represents over 200 clients with claims against Mr. Combs. Strikingly, an overwhelming number of these clients – likely in excess of eighty percent – have stated to me or attorneys at my firm, during their intake process, that Mr. Combs made threats of violence against them (or against

the client's family members) if the client disclosed to anyone the facts of the sexual assaults or other acts of Mr. Combs' of which they were a victim.

5. In Ms. Doe's case, Combs threatened her after raping her, saying "You better not tell anyone about this, or you will disappear."

6. For many of the clients referenced above, Mr. Combs' threats of violence were a *primary reason* why they did not speak out or file lawsuits earlier. Most of our clients still fear retribution and have conditioned moving forward on anonymity.

7. With regard to this action, Plaintiff Jane Doe has not spoken publicly about the incidents that underlie the causes of action in her Complaint.

Dated: OCTOBER 16, 2024

/s/ Anthony G. Buzbee
Anthony G. Buzbee